DOCUMENT NO. 5682

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

RECEIVED IN
JAN 28 1994
Office of Program Execution

January 26, 1994

Reply to
Attn. of: HW-124

RECEIVED
FEB 10 1994
Environmental Restoration Division

Mr. Jerry Lyle, Director
Environmental Restoration Division
U.S. Department of Energy
Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83402

Re: Resolution of EPA's Comments on TAN OU 1-07B Draft Final RI/FS.

Dear Mr. Lyle:

Our respective staffs have discussed our concerns regarding the potential for Dense Non-Aqueous Phase Liquid (DNAPL) at Idaho National Engineering Laboratory (INEL) and I believe have reached a position that my Agency can support. As time was short for reaching a resolution, not all of the details have been finalized, but the major elements, as we understand them are acceptable. Towards that end, we have included our summary understanding of the discussions and those elements which we feel must be included in an addendum to the RI/FS to address our concerns.

Because of the necessity to flesh out the enclosed outline into a document suitable for use as an addendum, we recommend that the period for finalization of the RI/FS be extended pursuant to Paragraph 8.18 of the Federal Facility Agreement. In addition, the draft Proposed Plan should be resubmitted within 15 days of the date of this letter along with the RI/FS Addendum.

We recognize that there are differing opinions on whether the addendum will be new information or the result of informal dispute resolution between EPA and DOE. It is our hope that when the Proposed Plan and RI/FS with Addendum are finalized, everyone's concerns will be addressed.

Please contact me at (206) 553-7261, if you wish to discuss this matter further.

Sincerely,

Wayne Pierre, Chief
Federal Facility Section I

cc: Dean Nygard, IDHW
Lisa Green, DOE-ID

ATTACHMENT
ISSUES TO BE INCLUDED IN RI/FA ADDENDUM

- Acknowledgement that the information available on site use history and data obtained during the site investigation of groundwater contamination are inconclusive regarding DNAPL occurrence.

- Because of the uncertainty regarding DNAPL occurrence, an "observational approach" (i.e., phased approach) to groundwater restoration should be implemented.

- The Remedial Action Objectives should concurrently address the secondary source of TCE in close proximity to the TSF-05 Well and the downgradient dissolved phase TCE plume. Therefore, the proposed alternatives should be separated into two parts:

    - The first part should address potential alternatives for sludge/sediment removal near TSF-05. The alternatives should include the interim action along with proposing enhancements to the interim action (e.g., a phased approach of technologies to promote sludge/sediment removal and/or concurrent treatability studies to study potential new technologies for removal of the sludge/sediment).

    - The second part which would occur concurrent with the first would evaluate a minimum of three alternatives aimed at initially reducing the mass of dissolved TCE (e.g., the >5,000 ug/l TCE contamination) while simultaneously evaluating for the presence of DNAPLs not associated with the sludge/sediment in close proximity to Well TSF-05. Alternatives evaluated would assume that no potential sources of DNAPL exist, other than the sludge/sediment at TSF-05. The alternatives evaluated for this part should be a comparison of different pumping levels with aboveground treatment, to expected residual TCE plume contaminant levels at the end of 5 years from the ROD date, assuming 10 pore volumes would be needed to remove dissolved phase TCE from the aquifer.

- A commitment that if the selected alternative in the Proposed Plan is to pursue one of the limited action(s) stated above, this alternative would be reevaluated in the WAG 1 ROD and/or INEL-wide groundwater RI/FS and ROD.